

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

LARRY REID, et al.,)	Case No. 1:21-CV-00991
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
v.)	MAGISTRATE JUDGE JONATHAN D.
)	GREENBERG
DARRYL MOORE,)	
)	<u>JOINT MOTION TO CONVERT</u>
Defendant.)	<u>JANUARY 21, 2025 HEARING TO A</u>
)	<u>TELEPHONIC STATUS CONFERENCE</u>

Now come the parties, Plaintiffs Larry D. Reid and Larry Reid Live, LLC, by and through undersigned counsel, and Defendant Darryl Moore, by and through undersigned counsel, who respectfully move the Court to convert the January 21, 2025 hearing on the pending Fifth Motion to Enforce Settlement, Third Motion for an Order Compelling the Defendant to Show Cause Why He Should Not Be Held in Contempt, Motion to Impose a Fine Based on the Order, Motion for Attorney Fees, Costs and Motion for Sanctions Based Upon Ongoing Contempt and Vexatious Conduct (Doc. No. 45) to a telephonic status confernece.

On August 22, 2024, this Court appointed Marisa T. Darden and Robert J. Kolansky to represent Defendant Darryl Moore. (Doc. No. 81). Thereafter, on August 28, 2024, this Court held an Attorney-only Telephonic Status Conference with counsel for all parties. (Doc. No. 82). During the hearing, this Court scheduled a hearing to take place on October 1, 2024. (*Id.*). On September 25, 2024, the parties jointly moved this Court to continue the October 1, 2024 hearing. (Doc. 83). This Court granted the motion to continue and reset the hearing for November 1, 2024. (Doc. N/A: Non-document Order, September 25, 2024). On October 29, 2024, the parties jointly moved this Court to continue the November 1, 2024 hearing. (Doc. 84). This Court granted the

motion to continue and reset the hearing for December 6, 2024. (Doc. N/A: Non-document Order, October 30, 2024). Then, on November 29, 2024, the parties jointly moved this Court to continue the December 6, 2024 hearing. (Doc. 85). This Court granted the motion to continue and reset the hearing for January 16, 2025. (Doc. N/A: Non-document Order, December 2, 2024). Thereafter, this Court rescheduled the hearing to January 21, 2025. (Doc. N/A: Non-document Order, December 2, 2024).

Instantly, counsel for the parties jointly request this Court convert the January 21, 2025 hearing to a telephonic status conference. The parties have engaged in good faith negotiations for some time, but have been significantly delayed by Mr. Vasvari's medical condition. Recently, Mr. Vasvari underwent a significant surgical procedure, and was hospitalized for 43 days. As a result, Mr. Vasvari has been significantly limited in his ability to work, including on this matter, and is only now nearing the end of his prescribed recovery period. At this time, the parties intend to re-engage in additional negotiations aimed at resolving this matter short of a hearing, as was the intent prior to the intervening medical concerns. The parties require additional time to finalize these negotiations on behalf of their respective parties. The parties would like to update the Court more specifically on these negotiations and the medical cause for the delay. Wherefore, the parties jointly request the hearing be converted to a telephonic status conference on January 21, 2025.

Respectfully submitted,

/s/ Robert J. Kolansky

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CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Robert J. Kolansky

Robert J. Kolansky (NJ: 078572016)

One of the Attorneys for

Defendant Darryl Moore